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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte Presentation in *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338

Dear Ms. Dortch:

BellSouth Telecommunications, Inc. ("BellSouth") submits this ex parte letter presentation to respond to MCI's claims that BellSouth has "no operational methods in place by which to provide unbundled access to Integrated Digital Loop Carrier ("IDLC") loops," and "has not unbundled a single IDLC loop for competitive LEC use, and appears to have no plans to do so."¹

MCI's claims are entirely untrue. BellSouth provides access to IDLC loops in at least the following eight (8) different ways, which have been considered and approved by this Commission and all of the state commissions in BellSouth's region in the context of its Section 271 applications:

Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.

Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier ("NGDLC") systems, BellSouth will "groom" the integrated loops to form a virtual Remote Terminal ("RT") arranged for universal service (that is, a terminal which can accommodate both switched and

¹ Reply Comments of MCI, WC Docket No. 04-313 (October 19, 2004) ("*MCI Reply Comments*"), pp. 40 & 42.

private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.

Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare Universal Digital Loop Carrier ("UDLC") equipment. For two-wire Integrated Services Digital Network ("ISDN") loops, the UDLC facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.

Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access ("INA") systems or other existing IDLC that terminates on Digital Cross-connect System ("DCS") equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC.

Alternative 5: When IDLC terminates at a switch peripheral that is capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC.

Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door/hairpin capable.

Alternative 7: BellSouth will install and activate new UDLC facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the [Carrier Service Area] CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.

Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.²

² BellSouth Comments, WC Docket No. 04-313 (October 4, 2004), Attachment 3, Affidavit of W. Keith Milner, ¶ 5.

Furthermore, notwithstanding MCI's claims to the contrary, BellSouth has previously unbundled multiple IDLC loops at the request of various Competitive Local Exchange Carriers ("CLECs"). Although BellSouth does not routinely track this information, particularly when it has no obligation to do so, BellSouth recently reviewed a sample of 243 completed orders in Florida for the period January – March 2004. Of that sample, 78 were requests for Service Level 1 ("SL-1") loops that were previously working over IDLC. BellSouth converted 37 of the 78 loops to copper (Alternative 1) or UDLC (Alternative 3) as described above. Forty-one (41) of the 78 loops were on integrated NGDLC and stayed on NGDLC utilizing Alternative 2.

In addition, 47 of the sample of 243 completed orders were requests for Service Level 2 ("SL-2") loops that were assigned to IDLC facilities. BellSouth unbundled 37 of these loops via the side-door/hairpin arrangement (Alternatives 5 or 6), while the remaining ten (10) utilized a Digital Cross-connect System ("DCS") by moving to another IDLC (Alternative 4). Thus, BellSouth's review of this limited sample of orders confirms that BellSouth in fact has operational methods in place by which to provide unbundled access to IDLC loops and has successfully used these methods to fulfill CLEC requests.

While MCI baldly claims that four (4) of the eight (8) unbundling options that this Commission has previously reviewed and approved (Alternatives 1, 3, 7, and 8) "are not options for unbundling IDLC at all,"³ BellSouth has successfully utilized Alternatives 1 and 3 and will continue to utilize Alternatives 1 and 3 to meet the requests of CLECs that are actually placing orders. Further, Alternatives 7 and 8 require express approval from the CLEC before implementation.

Finally, MCI claims that it is "unable to determine the applicable rates, terms and conditions" for unbundling IDLC loops and that "unique interconnection agreements" would be required.⁴ To the contrary, the same rates, terms and conditions apply to unbundled loops regardless of the loop's underlying technology except as differentiated by loop type requested (i.e., SL-1, SL-2, HDSL, etc.). Further, MCI does not need a "unique" interconnection agreement to access unbundled IDLC loops. MCI's current Interconnection Agreement allows it to utilize these methods (Att. 3, Sec. 4.13, attached hereto).

³ *MCI Reply Comments* at p. 41.

⁴ *Id.* at p. 42.

Given this Commission's prior approval of BellSouth's alternative methods for unbundling IDLC loops and the fact that BellSouth is provisioning such loops successfully utilizing these approved alternatives, this Commission should summarily dismiss MCI's unsupported claims concerning unbundled access to IDLC loops.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is fluid and cursive, with the first name "Glenn" and last name "Reynolds" clearly distinguishable.

Glenn T. Reynolds

Cc: Michelle Carey
Thomas Navin
Jeremy Miller
Russell Hanser
Pamela Arluk
Marcus Maher
Ian Dillner